



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

LRO  
F. #2022R00580

*271 Cadman Plaza East  
Brooklyn, New York 11201*

November 20, 2023

By E-mail and ECF

The Honorable Dora L. Irizarry  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Shlomo Patchiav  
Criminal Docket No. 23-99 (DLI)

Dear Judge Irizarry:

The parties jointly and respectfully submit this letter, pursuant to the Court's October 18, 2023 order, to provide a status report in the above-captioned case. As set forth below, while the government is prepared to request a briefing schedule for pretrial motions, the defendant requires additional time to review discovery and respectfully requests that the Court adjourn the upcoming November 27, 2023 status conference until approximately January 2024. The government does not object to that request.

As the Court is aware, on March 6, 2023, a grand jury sitting in the Eastern District of New York returned an indictment charging the defendant with extortion conspiracy, in violation of Title 18, United States Code, Section 1951(a). Since then, the government has made multiple productions of discovery to the defendant, including on July 17, 2023, August 29, 2023 and September 26, 2023. The government has also conferred with defense counsel to answer questions and to facilitate defense counsel's access to the discovery materials, including by providing technical assistance where necessary.

The government understands that the defendant's review of the discovery remains ongoing, and that the defendant intends to retain an expert to analyze cell phone data. Defense counsel has further advised that counsel has upcoming court conflicts and deadlines, including trials expected to proceed in the coming weeks. The defendant therefore requests an adjournment of the upcoming November 27, 2023 status conference until approximately January 2024. The government does not object to that request. The parties submit that an exclusion of time under the Speedy Trial Act is in the interests of justice, as it will afford the defendant an opportunity to

review discovery in order to evaluate possible pretrial motions and facilitate the parties' discussion of a potential resolution of this matter. See 18 U.S.C. § 3161(h)(7).

Respectfully submitted,

BREON PEACE  
United States Attorney

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cc: Counsel for the Defendant (by ECF)  
Clerk of Court (DLI) (by ECF)